



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

December 6, 2005

OFFICE OF THE  
REGIONAL ADMINISTRATOR

Maureen T. Koetz  
Principal Deputy Assistant Secretary  
Installations, Environment & Logistics  
U.S. Air Force  
1665 Air Force Pentagon  
Washington DC 20330-1665

Dear Ms. Koetz:

I am belatedly responding to your letter to me of March 23, 2005, which included a reference to the Air Force's decision not to proceed with the ST-12 groundwater cleanup at Williams Air Force Base. In your letter, you requested we discuss a number of Air Force matters prior to the DOD/EPA summit in May. As you know, we did have the opportunity to discuss some general policy issues prior to the summit, but we did not specifically discuss the issues at Williams.

I understand that since March there have been a series of staff discussions which lead to the EPA and Arizona invoking the Formal Dispute Resolution process over the Air Force's decision with regard to ST-12. The Dispute Resolution Committee (DRC) met this week in an attempt to resolve this ongoing dispute. During that meeting, EPA and the State of Arizona proposed a solution that your representative, Dexter Cochnauer, is currently considering. We are hopeful that this proposal, which we believe to be very reasonable, will resolve this dispute before the dispute is elevated to the next tier of dispute resolution, the Senior Executive Committee (SEC) in January.

In 1992, the Air Force, EPA and the Arizona Department of Environmental Quality signed a ROD selecting a pump and treat technology for the groundwater contamination at Williams. By 2000, the regulatory agencies and the Air Force agreed that the pump and treat remedy alone would not be effective in achieving remediation goals. The Air Force then proposed monitored natural attenuation (MNA) as an alternative remedy. The regulatory agencies opposed MNA as a stand alone remedy due to the extremely long time-frame (600-1200 years) it would take to achieve remediation goals based on MNA alone.

The Air Force, with the support of the regulatory agencies, convened an expert panel to analyze monitored natural attenuation (MNA) as well as active technologies to deal with the contamination. The experts concluded that steam injection would be a viable technology for the site and would reduce overall remediation time frames for the site. The regulators ultimately agreed to accept an Air Force proposal to utilize a Thermal Enhanced Extraction (TEE) technology. Over the course of the next two and a half years, the Air Force proceeded with system design and installation of the system until funding was pulled in December 2004.

EPA and Arizona have proposed that the Air Force take immediate steps to implement

the first phase of the TEE technology which all the parties have already invested significant time and money in design and installation. The first phase can be implemented at the same time the Air Force continues to explore other potential technologies and approaches.

We believe this is the best path forward for the following reasons:

1. The groundwater table is rising rapidly, approximately four feet per year, increasing the portion of the contamination which is within the saturated zone thereby reducing the portion of the contamination which can be addressed by the ongoing SVE system for deep soils.
2. The groundwater beneath Williams is designated a sole source aquifer by the State and MCLs were identified as ARARs in the 1992 groundwater ROD. This is one of the most rapidly growing areas of the state and demands on groundwater resources will only increase.
3. We believe that the work of the expert panel as well as investigation by our respective staffs over the past five years have identified the most likely remedy that will be effective at Williams.

We understand that the Air Force is interested in again exploring the use of performance-based contracting at Williams. While we support the Air Force's desire to continue to explore alternative options, we do not believe it is appropriate to do so without simultaneously employing a remedy to actively remove the considerable mass of contaminants below ST-12. In addition, it is important to note that in 2004, the Air Force issued a Request for Proposals for Williams very similar to what was proposed in the DRC meeting. We understand a handful of companies responded with proposals, which were all rejected by the Air Force. From this recent experience, we are concerned that addressing the fuel plume through this process may not be successful nor timely.

Again, EPA believes its proposal is a reasonable solution to the significant environmental problem at ST-12 at Williams Air Force Base. We look forward to hearing from the Air Force on or before December 30, 2005 regarding this proposal. In the interim, please feel free to call me if you would like to discuss this matter, or your staff can contact Keith Takata, my representative on the DRC. Thanks for your consideration and I look forward to hearing from you.

Sincerely,



Wayne Nastri  
Regional Administrator

cc: Mr. Stephen A. Owens, Director  
Arizona Department of Environmental Quality